Keith L. Slenkovich (SBN 129793) Keith.Slenkovich@wilmerhale.com Joseph F. Haag (SBN 248749) Joseph.Haag@wilmerhale.com Nathan L. Walker (SBN 206128) Nathan.Walker@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 950 Page Mill Road Palo Alto, CA 94304 Telephone: (650) 858-6000 Facsimile: (650) 858-6100 William F. Lee (pro hac vice) William.Lee@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 60 State Street Boston, MA 02109 Telephone: (617) 526-6000 Facsimile: (617) 526-5000 James M. Dowd (SBN 259578) James.Dowd@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 350 S. Grand Avenue, Suite 2100 Los Angeles, CA 90071 Telephone: (213) 443-5300 Facsimile: (213) 443-5400

Alexander Hadjis (pro hac vice)
Alexander.Hadjis@cwt.com
CADWALADER, WICKERSHAM & TAFT
LLP
700 Sixth Street, NW
Washington, DC 20001
Telephone: (202) 862-2323
Facsimile: (202) 862-2400

Rudy Y. Kim (CA SBN 199426) RudyKim@mofo.com MORRISON & FOERSTER LLP 755 Page Mill Road Palo Alto, CA 94304 Telephone: (650) 813-5600 Facsimile: (650) 494-0792

Joshua A. Hartman (pro hac vice) JHartman@mofo.com MORRISON & FOERSTER LLP 2000 Pennsylvania Avenue NW Suite 6000 Washington, DC 20006 Telephone: (202) 887-1500 Facsimile: (202) 887-0763

Attorneys for Defendant FREESCALE SEMICONDUCTOR, INC.

Attorneys for Plaintiff MEDIATEK INC.

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

MEDIATEK INC.

Plaintiff,

v.

FREESCALE SEMICONDUCTOR, INC.

Defendant.

Civil Action No. 4:11-cv-05341 (YGR) (JSC) ORDER CONFIRMING JOINT STATEMENT OF PRETRIAL TASKS

Hon. Yvonne Gonzalez Rogers

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Palo Alto, California 94304

Pursuant to paragraph 9 of the Court's Pretrial Order No. 1 (Dkt. No. 433), MediaTek Inc. ("MediaTek") and Freescale Semiconductor, Inc. ("Freescale") hereby submit this Joint Statement of Pretrial Tasks. At the pretrial conference on February 7, 2014, the Court outlined various tasks for the parties to address in the coming weeks. This submission identifies those tasks.

The parties shall jointly file the following items by noon (12:00 p.m.) on February 24, 2014:

- 1. Statement of Additional Undisputed Factual Stipulations;
- 2. Statement of Procedural Stipulations, Pursuant to Exhibit A to the Court's Pretrial Order;
- 3. Summary of Experts' Opinions Disclosed in Their Expert Reports;
- 4. Revised Exhibit List;
- 5. Revised Jury Instructions;
- Remaining Discovery Designation Disputes, Including Video Designations; and
- 7. Revised List of Potential Trial Witnesses (Dkt. No. 433 ¶ 8).

The parties further jointly commit to meet and confer in good faith on the following topics, in an attempt to reach a mutually satisfactory resolution:

- 1. **Joint Stipulations**: The parties will meet and confer on a list of additional Joint Stipulations, as well as on whether a list of Joint Stipulations should be read to the jury and whether the parties will agree to providing a list of Joint Stipulations to the jury.
- 2. **Admissibility of Exhibits**: The parties will meet and confer regarding the admissibility of exhibits on the parties' revised exhibit list.
- 3. **Reference Manuals**: The parties will meet and confer to determine a manageable approach for admission of Freescale product reference manuals as exhibits.
- 4. **Translator**: The parties will meet and confer to agree on one joint translator for any witnesses who require a translator in court.

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5.	<b>Verdict Form</b> : The parties will meet and confer to develop a joint verdict form
	based on MediaTek's proposed verdict form.

- 6. Order of Case: The parties will meet and confer to determine an agreed-upon sequence regarding the parties' respective presentations of their cases-in-chief, rebuttals, and potential sur-rebuttals.
- 7. **The '244 Patent**: The parties will meet and confer about a stipulation for dismissal of the '244 patent.
- 8. Exchange of Opening Statement Graphics: The parties will meet and confer to determine a schedule for exchanging any visuals, graphics, or exhibits to be used during opening statements, with the exchange taking place no later than March 10, 2014 unless otherwise agreed by the parties. The parties will further meet and confer in attempt to resolve any disagreement concerning opening statements and understand that any unresolved objections to opening statements must be made in a writing not to exceed three pages by March 14, 2014.
- Exchange of demonstratives: The parties will meet and confer about demonstratives, including the timing of exchange of demonstratives and any objections to demonstratives.

Dated: February 12, 2014 Respectfully submitted,

WILMER CUTLER PICKERING HALE AND DORR LLP

By:\_/s/ Keith L. Slenkovich\_

Keith L. Slenkovich

Keith L. Slenkovich (SBN 129793)
Keith.Slenkovich@wilmerhale.com
Joseph F. Haag (SBN 248749)
Joseph.Haag@wilmerhale.com
Christopher A. Franklin (SBN 272587)
Christopher.Franklin@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP

950 Page Mill Road Palo Alto, CA 94304 Telephone: (650) 858-6000 Facsimile: (650) 858-6100 William F. Lee (pro hac vice) William.Lee@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 60 State Street Boston, MA 02109 Telephone: (617) 526-6000 Facsimile: (617) 526-5000 James M. Dowd (SBN 259578) James.Dowd@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 350 S. Grand Avenue, Suite 2100 Los Angeles, CA 90071 Telephone: (213) 443-5300 Facsimile: (213) 443-5400 Attorneys for Plaintiff MEDIATEK INC. Respectfully submitted,

Dated: February 12, 2014 Respectfully submitted

FREESCALE SEMICONDUCTOR, INC.

By its attorneys,

## /s/ Alexander J. Hadjis

Alexander J. Hadjis (pro hac vice) Alexander.Hadjis@cwt.com CADWALADER, WICKERSHAM & TAFT LLP 700 Sixth Street, N.W.

Washington, D.C. 20001 Telephone: (202) 862-2323 Facsimile: (202) 862-2400

Rudy Y. Kim (CA SBN 199426) RudyKim@mofo.com MORRISON & FOERSTER LLP 755 Page Mill Road Palo Alto, California 94304

Palo Alto, California 94304 Telephone: (650) 813-5600

Facsimile: (650) 494-0792

Joshua A. Hartman (pro hac vice) JHartman@mofo.com MORRISON & FOERSTER LLP 2000 Pennsylvania Avenue, NW Suite 6000

Washington, DC 20006 Telephone: (202) 887-1500 Facsimile: (202) 887-0763

Attorneys for Defendant-Counterclaimant FREESCALE SEMICONDUCTOR, INC.

IT IS SO ORDERED. Dated: February 18, 2014

ONNE GONZALEZ ROGERS U.S. DISTRICT COURT JUDGE

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